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Date: 1 September 2025

BY EMAIL

For the attention of the Case Team

southeastanglialink@planninginspectorate.gov.uk

Dear Case Team,

SEA LINK DCO APPLICATION (EN020026)

**SCC PRINCIPAL AREAS OF DISAGREEMENT SUMMARY STATEMENT
(PADSS)**

Thank you for your letter dated 8 July 2025, issued under s89(3) of the Planning Act 2008 which detailed the Examining Authority's 'procedural decision to request from each named local authority, Marine Management Organisation and the Environment Agency, a principal area of disagreement summary statement (PADSS)'.

Please accept this letter as the response from Suffolk County Council ("the Council") to the Planning Inspectorate's request.

As guided by the notes in Annex 1 of your letter, please find the completed table detailing the outstanding principal areas of disagreement which addresses: -

- the area of concern
- a brief explanation of the issue
- the Council's view on potential remedial measures to resolve the issue
- the Council's view on the likelihood of resolution

Principal Areas of Disagreement Summary Statement (PADSS)

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
1.	Access Routes for Construction			
1.1	Selection of access route and assessment of alternatives	Significant concerns have been raised to the Applicant regarding the justification of the choice of the western access route to the converter station site near Saxmundham via the B1121 and the inclusion of a crossing over the River Fromus. The Council believes other access routes which could have potentially avoided impacts caused by this access route have not been reviewed adequately.	A justification document for the selected route was produced by the Applicant at the Council's request; however, the Council believes the document did not adequately explain the justification for discounting other potential options, including the use of the consented Sizewell Link Road.	Low
1.2	Use of Benhall Railway Bridge, B1121	Significant concerns relating to the proposed use of the Benhall Railway Bridge, B1121, a Council asset which, due to its structural condition, has a weight restriction of 46 tonnes (STGO 1). The Applicant has proposed overbridging for Abnormal Indivisible Loads (AIL) movements, however due to the geometry of the bridge and its proximity to the A12, the Council	As per the current access route, the railway bridge would form critical infrastructure to deliver the Sea Link scheme, therefore joint engagement with all relevant stakeholders is required, including Suffolk County Council (as asset owner) and Network Rail (due to the interaction with the East Suffolk Line). Suffolk County Council and East Suffolk Council requested an in-person meeting to attempt to resolve	Not known at this stage.

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		<p>has concerns over the feasibility of this solution.</p> <p>It should also be noted that the bridge is also outside of the DCO Order Limits with the Applicant proposing that the overbridging will be dealt with by a Traffic Regulation Order (TRO).</p>	<p>outstanding highways matters, which was held in early August 2025. The Applicant did share further information on their approach to the overbridge but the Council as Local Highways Authority would still need to review the options put forward. It is likely that this issue will be carried into the Examination.</p>	
1.3	Proposed River Fromus Crossing	<p>The Council considers the construction of a 5 metre high bridge across the River Fromus a disproportionate solution in creating a permanent access to the converter station. The proximity and proposed scale of the bridge will result in permanent loss of woodland and create significant adverse effects on the landscape character and setting of the Grade II Listed Hurts Hall and Grade II* Listed St John the Baptist Church in Saxmundham.</p> <p>The setting of the crossing has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018), and the area is identified as an important landscape as a rural approach to Saxmundham, reinforcing its setting within the</p>	<p>The design of the access road and bridge would need to be of outstanding quality and harmonise with its setting.</p> <p>Regarding the scale, the Council understands the requirement of an appropriate clearance to comply with the Water Framework Directive, however consideration needs to be given to the design to mitigate the visual impact of the bridge.</p> <p>As currently proposed the Fromus Crossing is unacceptable.</p> <p>Although the design of the bridge is predominantly a district function, the Council supports the district's requirement that there be an appropriate consenting mechanism to ensure the design of the bridge is appropriate for its setting.</p>	<p>Not known at this stage.</p> <p>Little detail has been provided by the applicant regarding bridge design at this stage, with the indication being that design matters will be managed Post Consent.</p>

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		Fromus valley. The removal of vegetation to facilitate the construction of the bridge will also open up views towards the converter station site.		
2.	Converter Station Site			
2.1	Design - Building and landscaping masterplan	Concerns exist regarding the Applicant's approach to design regarding the Converter Station and associated landscaping of the site. A clear vision for the whole of the project is essential, but currently the lack of detail provided during pre-application is a cause of concern. Considering the scale of the development in a rural setting, good design for the converter station site is essential to mitigate the visual impacts of this and future schemes which may be accommodated on the converter station site. The Applicant should be undertaking a participatory approach to design with the other NSIP promoters who will be accommodated on the site, alongside the statutory consultees, including the relevant town and parish councils.	The Applicant has engaged with the Suffolk Design Review Panel (DRP) regarding the Masterplanning of the site, however it is felt there was a missed opportunity for the Applicant to publish the DRP feedback to demonstrate transparency and contribute to building public confidence in the project. Although the Suffolk DRP is a district function, the Council was invited to observe proceedings and supports East Suffolk Council in its discussions with the Applicant regarding masterplanning of the site.	Not known at this stage as work on the design of the converter station and masterplanning of the site would continue post decision if consent were granted.

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2.2	Surface water drainage and flood risk	Surface water drainage and flood risk at the converter station site needs to be comprehensively assessed and managed due to the topography and potentially poor infiltration properties of the Ancient Estate Claylands. Sufficient land should be included within the Order Limits to accommodate drainage for the site during construction and operation.	Ongoing discussions required with the Council as the LLFA.	Not known at this stage.
3.	DCO Order Limits			
3.1	Insufficient land for mitigation within Order Limits	Concerns over reductions applied to the Order Limits over the pre-application stage has limited the Applicant's ability to provide effective mitigation for areas including landscaping, visual amenity, and diversions of public rights of way	The Council has cited concerns to the Applicant and cited that the area along with the River Fromus and the field north of the converter station site should form part of the Order Limits. Discussions with the Applicant have been ongoing.	Not known at this stage.
3.2	Friston substation site – Differences between Sea Link and SPR proposals	The Applicant Order Limits regarding the Friston Substation site do not match those consented by Scottish Power Renewables (SPR). Areas of land set aside for landscape mitigation and diversion of public rights of way have not been included.	The Applicant needs to provide evidence that the Order Limits proposed around Friston substation is appropriate to accommodate mitigation for Sea Link, considering the mitigations already secured by the SPR consents.	Not known at this stage.

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4.	Development Consent Order			
4.1	Core Working Hours – Inclusion of Sundays and Public Holidays 7am-5pm	The Council regards the inclusion of core working hours which spans seven days a week and Public Holidays as unacceptable due to the lack of respite for local residents from the impacts associated with construction activities including disruption to local roads and public rights of way (PRoW) used for recreational activities at a time when they are most frequently used. Regarding the potential delivery of the substation in Friston under the Sea Link DCO, the Applicant has not committed to undertake construction under the working hours agreed under the SPR consent which does not include Public Holiday and Sunday working.	The Council requires the Applicant to align their working hours with SPR's consented schemes, which removes Saturday afternoons, Sundays and Public Holidays from the core working hours.	Unknown – The Applicant has explained the inclusion of Sundays and Public Holidays is for flexibility, so currently no movement towards an agreement to reduce or remove these additional hours.
4.2	Draft Management Plans	The Council is concerned regarding the level of detail submitted within the draft management plans. For example, the Construction Traffic Management and Travel Plan lacks rigorous controls on Heavy Goods Vehicle (HGV) routing and a cap on numbers in line with what has been assumed in the submitted	The Council expects a two-stage approach where Management Plans are submitted in accordance with Outline Management Plans for each phase of the development. The Council will also require further information on the embedding of controls within management documents and the subsequent	Not known at this stage.

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		assessments and what has been accepted in previous DCO consents. There is also no commitment that can be enforced in terms of worker shift patterns that form part of the embedded mitigation. The definition of 'workers' is also unclear and does not state whether it includes other visitors to site.	monitoring and enforcement of these measures.	
4.3	Protective provisions for works in the highways	The Council as Local Highway Authority (LHA) needs clarity on the Applicant's strategy on using statutory powers outside of the Order Limits of the DCO to deliver works within the highways boundary (including protective provisions).	Further discussions required between Applicant and LHA.	Not known at this stage.
4.4	Which consent will be used to construct substation at Friston (SPR or Sea Link)	The Applicant has yet to specify whether they would use their own DCO (if consented) or the SPR consent to build the substation at Friston. It is noted that there are discrepancies between the respective DCOs including the order limits for mitigation and core working hours.	The Applicant needs to make clear whether they plan to align with the SPR consent for the delivery of the substation in Friston or whether they plan to use the current terms of their own DCO (if consented).	Not known at this stage.
4.5	Definition of 'pre-commencement'	The Council is concerned regarding what is covered under the term 'pre-commencement works' within the DCO.	The Applicant needs to produce a scoping document which covers the pre-commencement activities to	Not known at this stage.

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		The Council's experience with other NSIPs has found that often the scope of 'pre-commencement works' can be ambiguous.	provide clarity to the relevant local authorities.	
5.	Substation site in Friston			
5.1	Surface water flood risk	Friston is a particularly sensitive area in terms of surface water flood risk to downstream receptors, and has been subject to flooding on multiple occasions, which the current Flood Risk Assessment fails to adequately address. It is essential that appropriate land is included on site to accommodate an effective drainage solution.	The Applicant's assessment should include various s19 investigations by the Lead Local Flood Authority (LLFA) under the Flood and Water Management Act 2010 and a discussion of the findings of the study undertaken by the BMT. The Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date. The Applicant should also consider drainage design in association with the drainage proposals consented under East Anglia One North and Two schemes.	Not known at this stage.
5.2	Flood risk mitigation	The Council as LLFA is concerned that the current order limits does not appear to provide sufficient space for drainage and mitigation, when compared to what has been secured in the SPR DCO consent for construction of the substation.	The LLFA has produced a Surface Water Management Plan (SWMP) for the Friston catchment, which the Applicant must refer to when assessing the existing surface water flood risk in the area.	Not known at this stage.

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6.	Public Rights of Way (PRoW)			
6.1	Public Rights of Way – Identification of issues within Environmental Statement	The division of the effects of the development on PRoW across several separate chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and level of importance of the local access network, quality of user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered cumulatively for a particular receptor, then an impact might be considered significant, as recognised in the Planning Inspectorate's Advice Note No. 9.	The Council requested that the Applicant that PRoW should be treated as a separate topic within the Environmental Statement to ensure impacts are specifically and suitably addressed, however this was not taken forward.	Low
7.	Coordination with Other NSIP Projects			
7.1	Lack of coordination and acknowledgement of cumulative effects of Sea Link alongside other NSIP projects	The Council is deeply concerned regarding the apparent lack of meaningful discussion between Sea Link and other NSIP projects in the same locality, to find opportunities to coordinate activities to reduce the impact of construction (e.g. on the highway network) of multiple	The Council cannot stress enough the importance of NSIP promoters not considering the impacts of their schemes in isolation. The mental health and wellbeing impacts are cumulatively increasing with each new project. Promoters must consider the impacts of their scheme in association with the timelines of the	Not known at this stage.

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		projects on host communities on the East Suffolk Coast. As a result, differing landfall and cable routes have been selected by separate projects which will increase the impacts of construction on the host communities, landscape, and ecology.	construction of other NSIP projects in geographic proximity and have meaningful discussions to develop strategies to minimise the impacts of multiple, successive NSIP schemes on host communities and the environment.	
7.2	Coordination with the National Grid Ventures (NGV) LionLink Scheme	Although the Converter Station site provides a colocation for both Sea Link and LionLink schemes, the Council feels that the Applicant could reduce the environmental and construction impacts of the scheme by laying additional ducts alongside those required for the Sea Link project (for example for HVAC cabling between the converter station and the substation at Friston).	The Council suggest that the Applicant includes the flexibility within the DCO to accommodate laying additional cable ducts for LionLink to reduce the impacts and disruption which would occur due to successive NSIP projects requiring to undertake cable installation in close proximity in both time and location.	Not known at this stage.
7.3	Delivery of substation at Friston – Interaction of cable route with consented East Anglia One North and Two Planting	As currently designed, there is a considerable risk that the HVAC cable corridor route proposed to the substation at Friston could impact the landscape planting consented under East Anglia One North and Two.	The Applicant needs to work with SPR to consider options to minimise the potential impacts of the proposed cable route into the Friston substation on the consented landscape planting for East Anglia One North and Two.	Not known at this stage
7.4	Construction compounds	The Applicant should seek to coordinate the Sea Link construction compounds with LionLink (where	The Council urges The Applicant to work with NGV to agree coordination of construction compounds to prevent	Not known at this stage

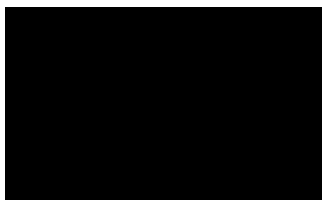
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	coordination with LionLink	works overlap) during construction of the converter station.	unnecessary impacts of separate construction compounds.	
8.	Cumulative Impacts			
8.1	Environmental and Socio-economic impacts of developments in East Suffolk.	<p>The Council has significant concerns regarding the cumulative environmental and socio-economic impact of Sea Link alongside the construction of other NSIP projects in the area, including Sizewell C and those consented which will be delivered by SPR. It is anticipated that this will create considerable cumulative pressure on the available workforce.</p> <p>The Council disagrees with the Applicant's assessment that the local labour force is of low sensitivity, as there are existing skills shortages in the region, which would be exacerbated by the cumulative impacts of other construction projects in the area. This could also reduce opportunities to secure any skills and employment legacy from the construction workforces as the projects are likely to be occurring in parallel.</p>	There is a need for a full assessment of environmental and socio-economic impacts of the cumulative effects of the project in conjunction with others taking place in East Suffolk.	Not known at this stage.
8.2	Impacts on Tourism	The construction of multiple projects on the Suffolk Coast is expected to	The Council considers it essential that the Applicant engages with local	Not known at this stage.

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		impact tourism, both in terms of visitor perception and visitor numbers due to the disruption which is anticipated. The Suffolk Coast economy relies heavily on tourism, and it is essential that the impacts of Sea Link (alongside other schemes) is considered, and appropriate mitigation measures and compensation is provided to support the local economy.	businesses and host communities who are directly affected by the scheme to discuss potential impacts and community benefits.	
8.3	Impacts on the road network	The proposed peak construction date for Sea Link (2027) will be close to the peak construction of Sizewell C (2028) with a likelihood that there will also be an overlap with SPR projects East Anglia One North and Two and East Anglia THREE), and also LionLink. There is a lack of cumulative assessment regarding the impacts of traffic from the respective projects. The Council is concerned regarding the cumulative impacts on the road network and expects the Sea Link proposals to contribute to the considerable effect to traffic on the routes leading to, and in proximity to the Suffolk Coast (including subsequent associated impacts to	The Applicant needs to undertake a cumulative assessment regarding the impacts of traffic from overlapping NSIP projects taking place on the Suffolk Coast, rather than presuming that other consented projects have already mitigated their harm.	Not known at this stage.

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
		air quality, noise, and vibration) local housing and services. The sequential delivery of NSIPs on the Suffolk coast will create successive impacts at the same locations and be detrimental to residents, local businesses, and tourism.		
9.	Schedulable Archaeological Site Discovery			
9.1	Approach to Neolithic henge site discovery in the Parish of Friston	A Neolithic henge site consisting of an approximate 90cm wide ring ditch with ditches 4-5m wide and up to 2m deep containing finds of Neolithic date has been identified in the Parish of Friston during Phase 2B of the archaeological trial trench evaluation work (Oxford Archaeology report 2864). Due to the timing of this discovery in a previously unknown site of high archaeological importance, impacts of this site were not available within any of the submitted assessment reports, and therefore not assessed within the submitted Environmental Statement Chapter 3: Cultural Heritage. Historic England have been notified of the site and consider it to be	Due its significance, preservation in situ is considered by the Suffolk County Council Archaeological Service (SCCAS) and Historic England to be the only appropriate way of managing the site. Within the submitted plans, the proposed cable corridor runs through the centre of the site and therefore SCCAS and Historic England advise that the Applicant must consider alternatives routing in this area to appropriately mitigate against impacts to this significant heritage asset. SCCAS and Historic England would not support the use of Horizontal Directional Drilling (HDD) as appropriate mitigation given the potential risks for negative impacts to occur.	Discussions ongoing regarding the Applicant's approach – so not known at this stage.

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		<p>schedulable quality and of national significance. Therefore, the site should be treated in line with designated heritage assets as per the National Planning Policy Framework and relevant sections of the National Policy Statements (EN-1 5.9.5-6 and EN-5 2.2.10).</p> <p>The Applicant are aware of the site and are currently considering the impacts and potential mitigation to avoid the site.</p>		

Yours faithfully,



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Suffolk County Council